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Ayrshire Joint Structure Plan 2025, Consultation Response, AMEC Wind

Many thanks for the opportunity to comment on the consultation draft of the new structure plan.

Background to AMEC comment

As you may be aware AMEC wind is currently developing Kyle Wind Farm in East Ayrshire / Dumfries and Galloway. AMEC has been developing the Kyle site for a number of years, and in that time we have worked closely with East Ayrshire Council to develop the site sympathetically with regards to a number of technical and environmental issues. Extensive baseline monitoring has been undertaken and further consultation has also occurred with a number of other statutory and non-statutory organisations as part of the development process.

We now hope to submit a Section 36 application to the Scottish Executive for the Kyle Wind Farm in early September of this year. The application will be for one hundred 3MW wind turbines with a maximum height to tip of 125metres.

A separate planning statement will be included as part our submission which appraises the development in line with the current structure plan, local plans and other relevant planning policy. Currently the Kyle site complies with relevant adopted planning guidance.

Draft Structure Plan Comments

In light of the above, the following comments relate to either the Renewable Energy or Glasgow Prestwick International Airport (GPIA) sections of the draft structure plan. Where appropriate we have also made reference to other documentation, which has supported the development of the structure plan.

1) Renewables Section 3.34

“A key aim of the structure plan is to facilitate renewable forms of energy within communities in ways that will allow it to act as an economic and sustainable driver of local economies in the future. This can be achieved through the introduction of innovative forms of technology, design and construction methods and in ways in which it can play a major role in the regeneration of communities”.

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AMEC Comment: AMEC fully supports the above structure plans team to maximise the socio economic benefits for local communities and the region as outlined in the above paragraph.

Question 18. *“How can Strategic Policy facilitate renewable energy systems to ensure that they act as an economic and sustainable driver for rural communities”?*

Perhaps the structure plan could encourage developers to undertake socio economic impact assessments of their proposals, and consider setting up some authority wide renewables trust. Whereby developer contributions are managed and distributed in a more equitable way throughout the structure plan rural areas, the focus of this trust could be on funding sustainable projects, thus achieving the aims of the structure plan.

2) Renewables Section 3.36

“Given the Government’s targets, there is an onus to find wind farm locations that would contribute to the overall national supply, but this cannot be at the expense of the environment. It is also recognized, however those local benefits arise from wind farms that can be important to the future economic regeneration of rural communities through opportunities for employment. To guide wind farm development in a manner that maintains landscape and biodiversity value two preferred areas for large-scale Commercial wind farm development have therefore been identified by a major study of landscape character, and their suitability will be tested during the consultation stage of the plan”.

Question 19. *“Two potential areas for commercial wind farm development have been identified, are these areas suitable? Should further areas be identified? What constraining factors do you envisage to future wind farm development”?*

AMEC Comment: The above question has been answered with regards both to the statement in the structure plan and with regards to Ayrshire and Clyde Valley Wind Farm Landscape Capacity Study, LUC 2003. The background document, which has driven the identification of “two preferred areas for large-scale commercial wind farm development”, and in relation to Report of Survey Technical Report 3, Renewables.

Technical Report 3 states

“...Accordingly to guide wind farm development in a manner that takes account of landscape sensitivity, indivisibility and the local resident population, two preferred areas for large scale commercial wind farm development have been identified. A third area near Dalmellington , East Ayrshire was also identified by the study as a potential area. This was excluded form the consultation draft of the structure plan on the grounds that it would impact on the approaches and navigation equipment at Glasgow Prestwick International Airport. The suitability of these areas for wind energy development against non-landscape criteria will be tested during the consultation phase of the structure plan.”

AMEC Comment Continued: It would appear that LUC consultants report identified three areas as suitable for large – scale commercial wind farms. The report concludes that the two areas shown on the map on page thirty of the draft structure plan are suitable, along with an area close to Dalmellington, i.e. the Kyle site which is currently excluded from the map. Since the driver for the locational guidance appears to be *“to guide wind farm development in a manner that maintains landscape and biodiversity value”*, the Dalmellington area should be included within the final structure

plan and its suitability based on non-landscape criteria such as impacts on GPIA tested through the EIA process.

3) Glasgow Prestwick International Airport Section 2.58

“In these circumstances the areas that are likely to support further expansion of the airport should be protected from adverse developments, and it is proposed that all land bounded on north and east by A79 A77 should be protected from alternative development proposals. In addition consideration will need to be given to protecting the wider operational requirements beyond the immediate boundaries of the airport. GPIA as noted, above, has distinct environmental advantages when compared to other Scottish airports. Analysis work, has in addition, shown the potential impact of commercial wind farm on the flight path. Careful consideration will, therefore need to be given to how the flight paths and other operational requirements can be protected from potentially adverse development proposal. There may be a case for limiting all significant development on, and in the immediate vicinity of flight paths, particularly those that could significantly increase population numbers”.

AMEC Comment: Surely it would be more appropriate if the structure plan included the Dalmellington area within the structure plan as suitable for wind farm development on landscape and visibility grounds (see previous comment), but make provision for wind farm developers to consult with GPIA, the Civil Aviation Authority and National Air traffic services.

Through its safeguarding map GPIA has stipulated an area either side of runway 31 final approach which should be precluded from wind farm development, AMEC has complied with this and has still managed to propose a large scale commercial wind farm scheme, within the area identified by LUC as potentially suitable in terms of landscape capacity etc. With regards to other operational requirements, AMEC has worked with GPIA and an independent aviation consultant in order to design a development, which minimises ground clutter on GPIAs surveillance radar system.

Overall conclusion

AMEC feels that the Dalmellington area should be identified in the Structure plan map as an area of potential for large-scale commercial wind farm development as supported by the LUC document. If the Dalmellington area is excluded, AMECs Kyle development a renewable energy project of some significance for Ayrshire, Scotland and the UK as a whole with a total capacity of 300MW, supplying 181,000 homes, potentially displacing 1.3 million tonnes CO₂ emissions (pa) could struggle to gain planning consent. The planning submission for the Kyle development will outline all of the measures AMEC has undertaken to mitigate against impact upon on GPIA. The submission will also include a detailed socio – economic impact assessment, outlining how the Kyle project could contribute to the local and regional economies through the procurement of regional goods and services. With restrictive locational policies in the structure plan it is unlikely that Ayrshire will be able to develop any kind of renewables based sustainability.

We would very much like the opportunity to discuss our thoughts with the structure plan team, please let me know if you think this would be appropriate,

Yours sincerely

Helen Thompson

